

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Albert Russo CN 4853 Trenton, NJ 08650 (609) 587-6888 Standing Chapter 13 Trustee	
In re: Michael C Bates Nicole Bates Debtor(s)	Case No. 19-29292 / MBK Hearing Date: February 4, 2020 10:00 am Judge: Michael B. Kaplan Chapter: 13

TRUSTEE'S OBJECTION TO DEBTOR(S) CHAPTER 13 PLAN

Albert Russo, Standing Chapter 13 Trustee, objects to the Debtor(s) Plan for the following reason(s):

The debtor has failed to supply the Trustee with the following document(s):

A copy of the homeowner's insurance renewal declaration - (policy expired 10/30/19).

Need statement for Prudential shares.

The debtor(s) plan consists of unnecessary or excessive expense items, such as:

Schedule J: \$450 childcare & \$200 school lunches (need proof), \$320 entertainment, \$217 Hancock life insurance loan, \$150 hair cuts, \$140 professional dues (need proof), \$85 continuing education courses (need proof).

The debtor(s) is not paying all disposable income into the plan pursuant to either Schedules I & J or Form 22C based upon the Trustee's review of the income and tax returns provided. The Trustee's calculations are higher for the following reason(s): Form 122c: Line #29 the Debtors have taken a \$510 education deduction (need proof), and \$217 life insurance loan deduction on Line #43. Debtor must also provide how numbers were reached on Line #16, Line #17, and Line #9b (PNC) as they depart from the Schedule J listings.

- Debtors must provide September and October bank statements for all accounts.

WHEREFORE, Standing Chapter 13 Trustee, Albert Russo, objects to confirmation of the plan.

/s/ Albert Russo

Albert Russo

Standing Chapter 13 Trustee

by: Mary Krieger, Staff Attorney